REMARKS

Claims 1-19 and 28-37 remain pending in the present application. Applicants thank the Examiner for indication that Claims 6-17 contain allowable subject matter. Claims 1, 2, 18, 19, 28 and 33 have been amended to further clarify that which was previously claimed, and Claims 34-37 were added to claim subject matter disclosed in the specification. Consideration and allowance of the remaining pending Claims is respectfully requested in view of the following comments.

Claim Rejections pursuant to 35 U.S.C. §102(b)

Claims 1 and 28-31 stand rejected pursuant to 35 U.S.C. §102(b) as being anticipated by European Patent Publication EP 0369434 (herein after referred to as EP '434). Applicants respectfully traverse these rejections for at least the following reasons and request reconsideration.

The Examiner has asserted that Figure 7C of EP '434 discloses the method of making a woven spider disclosed by Claims 1 and 28. Specifically, the Examiner has asserted that FIG. 7C of EP '434 discloses weaving a wrapped thread at a selected location in a cloth. Websters Ninth New Collegiate Dictionary, 1990 defines weaving as "to form (cloth) by interlacing strands (as of yarn); *specifically* : to make (cloth) on a loom by interlacing warp and filling threads." EP ' 434 discloses adhering a net shaped woven wire (20) to the surface of a damper raw material. (Col. 7 lines 32-36) The net shaped woven wire is formed by wrapping two sheets of conductive foil around twisted fibers. (Col. 7 lines 20-23) EP '434 further discloses that the woven wire is sewn to the surface of the damper raw material during either of two damper manufacturing methods. (Col. 5 lines 52-55 and Col. 6 lines 8-9) EP '434 also discloses

that a damper raw material comprises "a cloth material such as woven cloth, unwoven cloth, or the like." (Col. 5 lines 39-43)

Clearly, EP '434 does not teach, suggest or disclose the method of making a woven spider disclosed by Claims 1 and 28. Specifically, the method of amended Claim 1 describes selecting a thread of a cloth from which the spider is to be woven and weaving the wrapped thread at a selected location in the cloth to serve as part of the weave of the cloth in place of an unwrapped thread. EP '434 does not teach, suggest or disclose interlacing a thread wrapped with a conductor into a cloth from which a spider is to be woven to serve as part of the weave of the cloth in place of an unwrapped thread. In fact, EP '434 specifically teaches that the woven wire is "mounted to the damper raw material" (Col. 8 lines 19-25) that was already cloth material. The method of amended Claim 28 describes weaving the selected thread that is wrapped with an electrical conductor into a woven cloth at a shed or course of the woven cloth that forms a woven spider. As previously discussed, EP' 434 does not interlace a thread wrapped with an electrical conductor into a woven cloth at a shed or course of the woven cloth, but instead simply sews the woven wire onto the surface of the woven cloth.

As described on page 7 lines 12 through 15 of Applicants' specification, one of the know proposals to circumvent the problems described involves sewing conductors onto the surface of a spider, however this solution is unsatisfactory due to the increased manufacturing costs and possible damage to the conductors where the sewing needle penetrates the conductors. Applicants have further described in the detailed description the superiority of weaving the conductors as part of the cloth as described by Claims 1 and 28 (page 9 lines 14-17).

The Examiner has further asserted that forming an integral part of the woven cloth that is only the selected thread wrapped with the electrical conductor as described by Claim 30 is disclosed by EP '434. As previously discussed, EP '434 discloses sewing a thread wrapped with conductors along the top surface of a damper. The Webster's Ninth New Collegiate Dictionary,

1990 defines integral as "essential to completeness." Clearly, the thread wrapped with conductors in EP '434 is not an integral part of a woven cloth. As disclosed by EP '434, the damper raw material is already cloth material before the thread wrapped with conductors is sewed onto the surface of the damper. In addition, even if the thread wrapped with conductors in EP '434 could somehow be construed as essential to the completeness of a woven cloth, it is not the only thread forming an integral part of the woven cloth since EP '434 discloses that the thread wrapped with conductors is mounted on the surface of the cloth material that integrally forms the damper.

The Examiner has also asserted that EP '434 discloses a thread wrapped with an electrical conductor is a flex locus of a woven cloth as described by Claim 31. Webster's Ninth Collegiate Dictionary, 1990 defines the term flex as "to bend, esp. repeatedly" and a locus as "a place, locality." As previously discussed, EP '434 teaches that the woven wire is mounted on the damper. Accordingly, EP '434 discloses that the woven wire is positioned above the place where a bend in the woven cloth may occur and therefore cannot be the bend that occurs in the woven cloth. In contradistinction, Claim 31 discloses a thread wrapped with an electrical conductor that is the flex locus of a woven cloth. It follows that the flex locus of the damper in Fig. 8c of EP '434 is the woven cloth and the woven wire mounted on the damper is above the flex locus of the woven cloth and has its own flex locus near the same location. In other words, EP '434 discloses a damper with a flex locus and a woven wire with a flex locus, not a woven wire that is a flex locus of a damper as discussed in Claim 31.

For at least the foregoing reasons, Applicants respectfully request removal of the 35 U.S.C. §102(b) rejection of Claims 1, 28, 30 and 31. Since dependent Claim 29 depends from independent Claim 28, removal of the rejection of Claim 29 is also requested for the same reasons.

Claim Rejections pursuant to 35 U.S.C. §103(a)

Claims 2-4, 18, 19, 32 and 33 stand rejected pursuant to 35 U.S.C. §103(a) as obvious in view of EP '434 and further in view of Japanese Patent Publication JP 5-85196 (hereinafter referred to as "JP '196"). Applicants respectfully traverse these rejections for at least the foregoing reasons discussed with respect to EP '434 as well as the following reasons with respect to JP '196. Reconsideration is respectfully requested.

Applicants have amended Claim 2 to further clarify that the wrapped thread is weaved at a selected location in the cloth so that the wrapped thread is a flex locus of the cloth. As previously discussed, none of the cited references teach, suggest or disclose a wrapped thread that is weaved in a cloth to be a flex locus of the cloth. With regard to Claim 4, as previously discussed, EP '434 discloses a woven wire that is mounted on a damper. Clearly, weaving multiple wrapped threads at a single shed or course in a cloth as disclosed by Claim 4 is not taught, suggested or disclosed by EP '434. Even if the woven wire of EP '434 can somehow be construed as weaved in a cloth, which it clearly is not, a woven wire attached on top of a woven cloth does not constitute a single shed or course of the cloth.

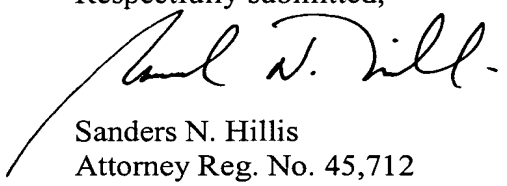
The Examiner has also asserted that JP '196 teaches "use of a conductive adhesive for the specific purpose of electrically connecting wrapped threads to conductive leads." More specifically, the Examiner has asserted that JP '196 teaches a conductive adhesive that is solder. Applicants have amended Claims 18 and 19 to clarify that the conductive adhesive forms a structural joint between the spider and the moving coil. In addition, Applicants have amended Claim 33 to disclose that a non-conductive adhesive is applied between the woven spider and a coil former over a conductive adhesive before the conductive adhesive has cured. As would be understood by one skilled in the art, solder cannot make a structural joint between a spider and a coil former. In addition, a conductive adhesive cannot be applied over solder before the solder has cured. Accordingly, the conductive adhesive of Claims 18, 19 and 33 is not solder. For at

least the foregoing reasons, Applicants respectfully request removal of the 35 U.S.C. §103(a) rejection of Claims 2, 4, 18, 19 and 33. In addition, Claims 3, 5 depend from Claim 1 and Claim 32 depends from Claim 28, and therefore removal of the 35 U.S.C. § 103(a) of these Claims is also respectively requested.

Applicants respectfully assert that the invention disclosed by new Claims 34-37 is not taught, suggested or disclosed by any of the cited references.

Applicants believe that Claims 1-19 and 28-37 are allowable in their present form and that this application is in condition for allowance. Accordingly, it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course. Should the Examiner deem a telephone conference to be beneficial in expediting allowance of this application, the Examiner is invited to call the undersigned attorney at the telephone number listed below. No fees in addition to what is enclosed are believed to be due at this time; however, should any additional fees be deemed required, please charge such fees to Deposit Account No. 23-1925.

Respectfully submitted,



Sanders N. Hillis
Attorney Reg. No. 45,712

SNH/cbw
Enclosure

BRINKS HOFER GILSON & LIONE
One Indiana Square, Suite 1600
Indianapolis, Indiana 46204
Telephone: (317) 636-0886
Fax: (317) 634-6701